

**REMARKS**

As a preliminary matter, the drawings are objected to for the reason set forth on page 2 of the Office Action. Applicants amend the drawings to delete the reference sign “a” from Figures 6 and 7, as indicated in the attached figures, to obviate the Examiner’s objection.

The specification is also objected to for the reasons set forth on pages 2-3 of the Office Action. Applicants amend the specification, as indicated herein, and believes that these amendments obviate the Examiner’s objection to the specification.

Claims 1-8 are all the claims pending in the application. Claims 1-8 are rejected under 35 U.S.C. § 102 (e) as allegedly being anticipated by Cheng et al. (US 20010032273).

With respect to independent claim 1, Applicants submit that Cheng does not teach or suggest at least “a function control converting section for converting a function control demand by one of said IP-based networks to a function control command for one of said non IP-based networks...,” as recited in claim 1. That is, claim 1 specifically describes a conversion of a “function control demand” of IP-based networks to a “function control command” of non IP-based networks. In Cheng, however, no such conversion of a function control demand takes place. The Examiner appears to believe that the “web service executor” disclosed in Cheng corresponds to the function control converting section recited in claim 1. However, the “web service executor” disclosed in Cheng merely changes the state of a non IP-based device when prompted (*see* Cheng, paragraph [0036], lines 17-18), but does not convert a function control demand by one of the IP-based networks to a function control command for one of the non IP-based networks. Yet further, Applicants submit that, in Cheng, non IP-based network device

information is “translated” into an IP-based network information, not the other way around. *See* Cheng, paragraph [0036], lines 11-12.

Therefore, at least based on the foregoing, Applicants submit that independent claim 1 is patentably distinguishable over Cheng.

Applicants submit that dependent claims 2-6 are patentable at least by virtue of their indirect or direct dependencies from independent claim 1.

With respect to independent claim 7, Applicants submit that Cheng does not teach or suggest at least “a fifth step of controlling said at least one of said target devices of said non IP-based networks by converting the command from said control device to the control command relevant to said at least one of said target devices and receiving a response from said at least one of said target devices,” for reasons similar to those set forth above with respect to claim 1.

Applicants submit that dependent claim 8 is patentable at least by virtue of its dependency from independent claim 7.

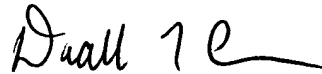
In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

**AMENDMENT UNDER 37 C.F.R. § 1.111**  
**U. S. Application No. 09/812,567**

**ATTORNEY DOCKET NO. Q61616**

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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